

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DAREN WATSON and CYRIL LEWIS,
on behalf of themselves and on
behalf of all other persons similarly situated,

Case No. 13-CV-0684 (LDW)(GRB)

Plaintiffs,

NOTICE OF MOTION

-against-

VISIONPRO COMMUNICATIONS CORP.,
VISIONPRO CORP., KEVIN SILVAR and
JOSEPH ROMANO,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying *Declaration of Kevin Silvar in Support of Defendants' Motion FLSA Collective Action Decertification*, and the exhibits annexed thereto, and the *Memorandum of Law in Support of Defendants' Motion for FLSA Collective Action Decertification*, Defendants VisionPro Communications Corp., VisionPro Corp., Kevin Silvar, and Joseph Romano (collectively, "Defendants") will hereby move this Court, before the Honorable Leonard D. Wexler, at the United States District Courthouse, located at 100 Federal Plaza, Central Islip, New York, pursuant to the briefing schedule So-Ordered on December 23, 2015, for decertification of the Fair Labor Standards Act Collective Action, conditionally certified pursuant to 29 U.S.C. 216(b), in accordance with Federal Rules of Civil Procedure and the applicable Local Rules, on the grounds Plaintiffs cannot demonstrate that the Collective Action is comprised of similarly-situated individuals, together with such other and further relief as may be just, proper, and equitable.

Dated: Woodbury, New York
January 11, 2016

KAUFMAN DOLOWICH & VOLUCK, LLP

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